

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION - DETROIT**

IN THE MATTER OF:

Michael D Frost & Aundrea Lynn Frost

CHAPTER 13

CASE NO. 16-56354-PJS

JUDGE PHILLIP J SHEFFERLY

Debtors _____ /

TRUSTEE'S OBJECTION TO PLAN MODIFICATION AND AMENDED SCHEDULES

Now Comes the Chapter 13 Trustee, KRISPEN S. CARROLL, and objects to the Proposed Plan Modification as follows:

1. Trustee objects to debtors' plan modification as debtors have failed to address the entire delinquency.
2. Trustee objects as debtor's proposed plan will not complete timely as it is underfunded.
3. Trustee requires debtors to remit a plan payment immediately as the last payment was received on November 6, 2018.
4. Trustee requires verification of debtor wife's income.
5. Trustee questions debtor husband's and wife's last days of work. Trustee questions if debtors received any income during time off work.
6. Trustee requires verification of current rent expense.
7. Trustee requires a complete copy of debtors' 2017 income tax return as well as any W-2/1099s attached to the return. Further, Trustee requires copies of debtor's 2018 W-2s/1099s.

Wherefore, the Chapter 13 Trustee prays this Honorable Court deny the relief requested.

Dated: January 15, 2019

OFFICE OF THE CHAPTER 13 TRUSTEE -DETROIT
KRISPEN S. CARROLL, CHAPTER 13 TRUSTEE

/s/ MARIA GOTSIS

Krispen S. Carroll (P49817)

Maria Gotsis (P67107)

719 Griswold Street, Ste 1100

Detroit, MI 48226

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CERTIFICATE OF MAILING

I hereby certify that on the date indicated below, I electronically filed TRUSTEE'S OBJECTION TO PLAN MODIFICATION AND AMENDED SCHEDULES with the Clerk of the Court using the ECF system which will send notification of such filing to the following:

BABUT LAW OFFICES PLLC
700 TOWNER STE 1
YPSILANTI, MI 48198-5757

and I hereby certify that I have mailed by United States Postal Service the above mentioned documents to the following non-ECF participants:

Michael D Frost
Aundrea Lynn Frost
4275 Dover Street
Jackson, MI 49201

January 15, 2019

/s/ Shannon Horton

SHANNON HORTON

For the Office of the Chapter 13 Trustee-Detroit
719 Griswold Street, Ste 1100
Detroit, MI 48226
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